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Attorney for Bakken Resources, Inc.

IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK

---X
BAKKEN RESOURCES, INC.,

Plaintiff,

JOSEPH R. EDINGTON,
JEROD EDINGTON,
RYAN EDINGTON,
IWJ CONSULTING GROUP, INC,
TRIAX CAPITAL MANAGEMENT, INC.,
MARYCLIFF INVESTMENT CORP.,
AMERICAN CORDILLERA MINING CORP.

Defendants
---X

BAKKEN RESOURCES' MOTION FOR ATTORNEY'S FEES

Case No:15-CV-8686

PLAINTIFF'S MOTION FOR ATTORNEY'S FEES IN RELATION TO DEFENDANTS' MOTION TO DISQUALIFY COUNSEL AND COUNSEL'S CONDUCT

Plaintiff Bakken Resources, Inc. ("Bakken") respectfully moves this Court to issue an order (1) awarding Plaintiff all costs and fees under 28 U.S.C. § 1927 or other appropriate authority insofar as any cost or fee relates to Defendants' June 7, 2016 Motion submitted without a colorable basis on ECF No. 58 or to other of Defense Counsel's conduct to date that has recklessly caused unnecessary delay and has recklessly imposed unnecessary expenses upon Plaintiff, and (2) granting any further relief that this Court deems to be just, proper, or in the interest of justice. This Motion is made pursuant to Fed. R. Civ. P. 7 and 28 U.S.C. § 1927.

The bases for this motion stem both from Plaintiff's concurrently-filed Response on ECF No. 62 opposing Defendants' motion on ECF No. 58 and from considering such motion in light of the cumulative prejudicial impact that Defense Counsel's overall conduct has worked upon Plaintiff to date. *See e.g.* Order on ECF No. 57. Plaintiff's Response on ECF No. 62 opposing Defendants' motion on ECF No. 58 shows that such motion lacks a colorable basis while relying on misrepresented information.

DATED this eighth day of June, 2016.

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By /s/ Wesley J. Paul
/s/ Matthew C. Sferrazza
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